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*Attorneys for Plaintiff
GreenBroz, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GREENBROZ, INC., a Nevada corporation,

Case No.: 2:20-cv-02008-RFB-BNW

JOINT DISCOVERY PLAN AND SCHEDULING ORDER

Plaintiff,

V.

GREEN VAULT SYSTEMS, LLC; a Washington limited liability company.

Defendant

Pursuant to the Court's Order (ECF No. 24), Fed. R. Civ. P. 26(f), and Local Rule 26-1, the respective parties conducted a discovery planning conference on February 10, 2021, and hereby submit to the court the following proposed Discovery Plan and Scheduling Order.

DISCOVERY PLAN AND SCHEDULE

I. DISCOVERY AND EXPERTS

A. Rule 26(a)(1) Disclosures

The Parties will exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) by October 11, 2021.

B. Subject of Discovery, Completion of Discovery, and Phased Discovery

Plaintiff's Statement: Plaintiff intends to conduct discovery related to the agreement between Plaintiff and Defendant regarding the sale of Defendant's products. Plaintiff also intends to conduct discovery related to the revenues, sales, and profits of Defendant's products. Plaintiff intends to propound requests for production of documents, interrogatories, requests for admission, and deposition testimony. Plaintiff does not believe that discovery needs to be phased with the exception that Plaintiff believes that Defendant should provide financial information concerning sales of the Defendant's products prior to any settlement conference or mediation.

Defendant's Statement: Defendant will seek discovery showing that plaintiff knowingly sells equipment for marijuana processing and distribution, has no enforceable contract, did not comply with the alleged contract, suffered no damages, and owes defendant monies for converting and reselling defendant's equipment without compensation and interfering in an equipment sale.

C. Discovery of Electronically Stored Information

The parties do not perceive this to be a complex case and do not anticipate that discovery of electronically stored information (“ESI”) will be extensive. Accordingly, the

1 parties propose to exchange responsive ESI in Optical Character Recognition (OCR)
2 searchable PDF file format. The parties may want to seek production of e-mails in native
3 formats to ease searchability. The parties will accommodate reasonable requests for native
4 versions of specific documents produced by the producing party.

6 **D. Protective Order**

7 The parties anticipate filing a stipulated protective order for this case.

9 **E. Limitations on Discovery**

10 The parties agree that the normal limitations on the number of interrogatories as
11 provided by Federal Rules of Civil Procedure and the Local Rules should apply to this case
12 (25 per party). The parties anticipate each conducting 3-9 depositions, plus expert depositions.

14 **F. Expert Discovery**

15 The parties propose a deadline for expert disclosures on March 11, 2022.

16 **II. SIGNIFICANT MOTIONS**

18 **A. Amendments to the Pleadings and Adding Parties**

19 The parties propose a deadline for filing amended pleadings or adding parties on
20 January 14, 2022.

21 **B. Dispositive Motions**

23 The parties propose a deadline for filing dispositive motions on July 22, 2022.

24 **III. JOINT PRETRIAL ORDER AND DISCLOSURES**

25 The parties propose a deadline for filing a joint pretrial order on September 9, 2022.

27 **IV. ALTERNATIVE DISPUTE RESOLUTION**

28 The Parties have met and conferred about the possibility of alternative dispute

1 resolution (“ADR”).

2 Plaintiff's Statement: Plaintiff is agreeable to participate in ADR, specifically a
 3 settlement conference or mediation, but believes that ADR will be more productive after
 4 Plaintiff receives financial information concerning sales of the Defendant's products.

5 Defendant's Statement: Defendant has and continues to be willing to participate in
 6 early ADR.

7 **V. ALTERNATIVE FORMS OF CASE DISPOSITION**

8 The parties have considered trial by a magistrate judge and use of the Short Trial
 9 Program, and do not consent to either.

10 **VI. PROPOSED SCHEDULE**

11 Event	12 Proposed Deadlines
13 1. Discovery Cut-Off	14 June 23, 2022
15 2. Amending the Pleadings and Adding Par- 16 ties	17 January 14, 2022
18 3. Disclosure of Rule 26(a)(2) Disclosures 19 (experts)	20 March 11, 2022
21 4. Dispositive Motions filing deadline	22 July 22, 2022
23 5. Joint Pretrial Order	24 September 9, 2022
25 6. Fed. R. Civ. P. 26(a)(3) Disclosures (wit- 26 ness and exhibit lists)	27 September 9, 2022

28 Dated: September 17, 2021

Respectfully submitted,

BUCHE & ASSOCIATES, P.C.

/s/ John K. Buche

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10 Dated: September 17, 2021

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22 **Order**

23 IT IS ORDERED that ECF No. 25 is
24 DENIED without prejudice for failure to
25 comply with Local Rule 26-1. IT IS
26 FURTHER ORDERED that a new proposed
discovery plan and scheduling order is due
27 on 9/27/2021.

28 IT IS SO ORDERED
DATED: 9:53 am, September 20, 2021


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE